



Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036-6797
+1 212 698 3500 Main
+1 212 698 3599 Fax
www.dechert.com

GARY J. MENNITT

gary.mennitt@dechert.com
+1 212 698 3831 Direct
+1 212 698 3599 Fax

November 21, 2022

VIA ECF

Honorable Edgardo Ramos
United States District Judge
United States District Court for the Southern District of New York
40 Foley Square
New York, New York 10007

Re: *CCO Condo Portfolio (AZ) Junior Mezzanine, LLC v. Feldman et al*, 1:21-cv-02508-ER

Dear Judge Ramos:

Counsel for all parties to this action have conferred by telephone call and have agreed to request an adjournment of discovery. Pursuant to Rule 7.1(d) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York and Rule 1.E of Your Honor's Individual Practices, we write to request the Court approve a two-month (60 day) adjournment of all remaining deadlines in the Civil Case Discovery Plan and Scheduling Order (Dkt. No. 38) and so-order the attached Revised Discovery Plan and Scheduling Order. The parties have complied with the expired dates and thus it is the remaining dates that we seek to adjourn.

The parties are currently exploring the possibility of an amicable resolution of this matter and the requested adjournment will allow the parties and their counsel to focus their efforts on that prospect.

No other previous requests for an adjournment or extension of this nature have been made. We are available to respond to any questions the Court may have about the request.

Respectfully submitted,

/s/ Gary J. Mennitt

Gary J. Mennitt

cc: Defendants' Counsel (Via ECF)